

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

SERGEY SHESTAKOV,

Defendant.

Case No. 23 Cr. 16 (JHR)

**DECLARATION OF RITA M. GLAVIN IN SUPPORT OF
SERGEY SHESTAKOV'S MOTION TO COMPEL**

I, RITA M. GLAVIN, an attorney admitted to practice before this Court, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a principal of the law firm Glavin PLLC and represent Mr. Sergey Shestakov in the above-captioned action.

2. I submit this declaration in support of Mr. Sergey Shestakov's motion to compel the government to produce certain categories of discovery pursuant to Rule 16 and *Brady v. Maryland*. I have knowledge of the issues described herein.

3. In accordance with Local Criminal Rule 16.1, we met and conferred in good faith with the U.S. Attorney's Office for the Southern District of New York ("USAO") numerous times. Despite our discussions and correspondence, we could not reach agreement on the discovery materials.

4. Attached hereto as **Exhibit A** is a true and correct copy of the indictment in *United States v. Graham Bonham-Carter*, 22 Cr. 503 (PAE).

5. Attached hereto as **Exhibit B** is a true and correct copy of the indictment in *United States v. Deripaska*, 22 Cr. 518 (PKC).

6. Attached hereto as **Exhibit C** is a true and correct copy of the government's letter to me dated May 18, 2023.

7. Attached hereto as **Exhibit D** is a true and correct copy of a document produced by the USAO in this action bearing the Bates numbers USAO 0000048–USAO 00000052.

8. Attached hereto as **Exhibit E** is a true and correct copy of Judge Nathan's opinion in *United States v. Nejad*, 487 F.Supp.3d 206 (S.D.N.Y. 2020).

9. Attached hereto as **Exhibit F** is a true and correct copy of Judge Castel's opinion in *United States v. Niket Jain*, 19 Cr. 59 (PKC), 2020 WL 6047812 (S.D.N.Y.)

10. Attached hereto as **Exhibit G** is a true and correct copy of the December 17, 2021 court conference transcript from *United States v. Anilesh Ahuja, et al.*, 18 Cr. 328 from (AJN).

Dated: New York, New York
October 19, 2023

/s/ Rita M. Glavin
Rita M. Glavin